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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:
ALL ACTIONS

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

**STATUS UPDATE, STIPULATION,
AND [PROPOSED ORDER]
REGARDING PLAINTIFFS' AND
YOUTUBE'S DMCS RIPE DISPUTES
ISSUES 2 AND 3**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

Defendants YouTube, LLC and Google, LLC (together, “Defendants”), and PI/SD Plaintiffs (collectively, the “Parties”), respectfully submit this update and stipulation to the Court:

WHEREAS, a Discovery Case Management Conference is scheduled before this Court on October 24, 2024.

WHEREAS, on October 18, 2024, the Parties filed a Discovery Case Management Statement, providing the Court with discovery updates, including ripe discovery disputes. With respect to Defendants YouTube and Google, the Parties raised, among other things, Ripe Dispute No. 2 [*YouTube’s Amended Responses or Confirmation in Writing of Agreements Reached by Parties*], and Ripe Dispute No. 3 [*YouTube’s Search of Non-Custodial Sources Identified by PI/SD Plaintiffs*]. The Parties provided their substantive positions on Ripe Dispute No. 2 in the Discovery Case Management Statement and reported that they intended to file a joint letter brief on Ripe Dispute No. 3 by October 22, 2024, so that both issues could be considered by the Court at the October 24, 2024, conference.

WHEREAS, the Parties have continued their discussions on both issues and have reached an agreement that they believe will resolve those issues or inform the scope of any remaining disputes on those issues.

NOW AND THEREFORE, the Parties respectfully request that the Court defer decision on Ripe Dispute No. 2 so that the Parties can engage in further meet and confers, and that the Court adopts the following schedule to ensure timely and efficient briefing of this issues:

- a. No later than October 25, 2024, by 5PM PT, Defendants will provide to Plaintiffs, in writing, agreed upon information regarding its search of non-custodial sources;
- b. No later than October 29, 2024, the Parties will hold a meet and confer on Ripe Dispute Nos. 2 and 3;
- c. No later than November 1, 2024, by 5PM PT, Plaintiffs will identify to Defendants, in writing, any remaining issues as to Ripe Disputes Nos. 2 and 3;
- d. No Later than November 6, 2024, by 5PM PT, Defendants will provide to Plaintiffs, in writing, substantive responses to remaining issues on Ripe Dispute Nos. 2 and 3;

- 1 e. No later than November 8, 2024, the Parties will hold an H(2) on any remaining
2 issues on Ripe Dispute Nos. 2 and 3; and,
- 3 f. No later than November 15, 2024, the Parties will file joint letter briefs as to any
4 remaining issues on Ripe Dispute Nos. 2 and 3, so that the Court may consider the
5 briefs at the next Discovery Case Management Conference.
- 6 g. The Parties agree to meet and confer in good faith at Plaintiffs' reasonable request
7 for information regarding YouTube's search and production from non-custodial
8 sources newly identified by Plaintiffs in YouTube's document production that
9 appear likely to contain relevant information or in response to an identified
10 deficiency. Plaintiffs agree that they will be reasonable and judicious in making any
11 such requests.

12
13 IT IS SO STIPULATED AND AGREED,

14
15 DATED: October 22, 2024

WILSON SONSINI GOODRICH & ROSATI

Professional Corporation

By: /s/ Lauren Gallo White

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DATED: October 22, 2024

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Plaintiffs' Steering Committee Membership

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ATTESTATION

I, Lauren Gallo White, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: October 22, 2024

By: /s/ Lauren Gallo White
Lauren Gallo White

ORDER

IT IS SO ORDERED that the foregoing Stipulation is approved:

DATED: _____

Hon. Peter H. Kang
United States District Court Magistrate Judge